Public and unsubstituted medicates to this instrument are probable food for prosent conference

16-141

#### UNITED STATES DISTRICT COURT

United States Courts Southern District of Texas FILED

SOUTHERN DISTRICT OF TEXAS

APR 0 6 2016

**HOUSTON DIVISION** 

David J. Bradley, Clerk of Cours

UNITED STATES OF AMERICA

CR. NO. 16 CR 0 141

VS.

FILED UNDER SEAL

Jose Jaime Solis Jr. Ramon Hipolito Sanchez

## **INDICTMENT**

#### THE GRAND JURY CHARGES THAT:

# **COUNT ONE**

# Conspiracy to Possess with the Intent to Distribute a Controlled Substance

From on or about late 2015, through the date of this Indictment, in the Southern District of Texas, and elsewhere,

# JOSE JAIME SOLIS JR., RAMON HIPOLITO SANCHEZ, AND

defendants herein, did unlawfully, knowingly, and intentionally, combine, conspire, confederate, and agree with each other and others, known and unknown

to the Grand Jury, to possess with the intent to distribute a controlled substance.

This violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(ii).

#### **COUNT TWO**

#### Possession with Intent to Distribute

On or about February 28, 2016, in the Southern District of Texas and elsewhere,

# JOSE JAIME SOLIS JR., RAMON HIPOLITO SANCHEZ, AND

defendant herein, did knowingly and intentionally aid, abet and assist others known and unknown to the Grand Jury in the possession with intent to distribute a controlled substance. This violation involved 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1); 841(b)(1)(A)(ii); and Title 18, United States Code, Section 2.

#### **COUNT THREE**

#### Possession of Firearm by a Prohibited Person

On or about March 24, 2016, in the Southern District of Texas,

#### JOSE JAIME SOLIS JR.,

defendant, having been convicted of a misdemeanor crime of domestic violence, to wit, on October 15, 2007, in Harris County, Texas the defendant was convicted in cause number 1470412 of Class A Misdemeanor Assault of a Family Member, did knowingly possess in and affecting commerce one or more firearms, namely, a Winchester, model 94 rifle, a Remington, model 700 rifle, a Walter .380 handgun, a Savage Arms .22 caliber rifle, and a Winchester, model 70, caliber 300 Winchester Magnum rifle, and ammunition, to wit: 26 rounds of Federal Premium .22 caliber ammunition, 15 rounds of Remington 30-30 caliber ammunition, 48 rounds of Monarch 380 caliber ammunition, all which had been shipped in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(9).

# NOTICE OF CRIMINAL FORFEITURE [Title 21, United States Code, Section 853]

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the defendants,

# JOSE JAIME SOLIS JR., RAM<u>ON HIPOLITO SANCHEZ, AND</u>

that upon conviction of the conspiracy as charged in Count One in this Indictment, the following is subject to forfeit:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

# NOTICE OF CRIMINAL FORFEITURE OF WEAPONS AND <u>AMMUNTION</u>

[Title 18 United States Code, Section 982]

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that all firearms and ammunition involved in, or used in the commission of the offense in violation of Title 18, United States Code, Section

922(g)(9) charged in Count One, is subject to forfeiture, including, but not limited to, the following:

- 1. Remington, model 700, rifle
- 2. Walter .380 handgun
- 3. Winchester, model 94, rifle
- 4. Savage Arms .22 caliber rifle
- 5. Winchester, model 70, caliber 300 Winchester Magnum rifle
- 6. 26 rounds of Federal Premium .22 caliber ammunition
- 7. 15 rounds of Remington 30-30 caliber ammunition
- 8. 48 rounds of Monarch 380 caliber ammunition

#### **Money Judgment**

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture for which the defendants may be jointly and severally liable. The amount of the money judgment for Count One is estimated to be, but is not limited to, at least \$4,480,000.00 for which the defendants may be jointly and severally liable.

### **Substitute Assets**

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of a defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with, a third party;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

the United States will seek to forfeit any other property of the defendants up to the value of such property pursuant to Title 21, United States Code, Section 853(p).

#### A TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS

JOHN JOCHER

Assistant United States Attorney

Southern District of Texas